| UNITED STATES DISTRICT COURT | |
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| SOUTHERN DISTRICT OF NEW YORK | K |

RACHEL YOUNGER, Individually and as Administrator of the Estate of NATHANIEL YOUNGER,

Case No. 11 Civ. 1173

Plaintiff.

MOTION TO ADMIT COUNSEL PRO HAC VICE

- against -

ZURICH AMERICAN INSURANCE COMPANY and UBS FINANCIAL SERVICES, INC.

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I John J. Scura II, Esq., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of :

Christopher Heyer, Esq. Scura, Mealey, Wigfield & Heyer, LLP 1599 Hamburg Turnpike Wayne, New Jersey 07470 Tel. (973) 696-8391 Fax. (973) 696-8571

Christopher Heyer is a member in good standing of the Bar of the States of New York and New Jersey. There are no pending disciplinary proceedings against Christopher Heyer, Esq.

Dated: June 9, 2011 Wayne, New Jersey

Ву:

Respectful

John J. Scura II, Esq.

SDNY Bar JS7016

Scura, Mealey, Wigfield & Heyer, LLP

1599 Hamburg Turnpike Wayne, New Jersey 07470

Tel. (973) 696-8391 Fax. (973) 696-8571

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| SOUTHERN | DISTRICT | OF NE | WYORK |

RACHEL YOUNGER, Individually and as Administrator of the Estate of NATHANIEL YOUNGER,

Case No. 11 Civ. 1173

Plaintiff,

AFFIDAVIT OF JOHN J. SCURA II, ESQ. IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

- against -

ZURICH AMERICAN INSURANCE COMPANY and UBS FINANCIAL SERVICES, INC.

Defendants.

State of New Jersey)
) ss:
County of Passaic)

John J. Scura II, Esq., being duly sworn, hereby deposes and says as follows:

- 1. I am a member of the law firm of Scura, Mealey, Wigfield & Heyer, LLP, counsel for Defendant UBS Financial Services, Inc. in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant UBS Financial Services, Inc.'s motion to admit Christopher Heyer, Esq. as counsel pro hac vice to represent Plaintiff in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in 1991. I am also admitted to the bar of the State of New Jersey, the United States District Court for the District of New Jersey, and am in good standing with this Court.
- 3. I have known Christopher Heyer, Esq. since January 2001.
- 4. Mr. Heyer is a member of the law firm of Scura, Mealey, Wigfield & Heyer, LLP.
- 5. I have found Mr. Heyer to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of procedure.
- 6. Accordingly, I am pleased to move for the admission of Christopher Heyer, Esq, pro hac vice.
- 7. I respectfully submit a proposed Order granting the admission of Christopher Heyer, Esq., pro hac vice, which is annexed hereto as Exhibit "A".

WHEREFORE, it is respectfully requested that the motion to admit Christopher Heyer, Esq., pro hac vice, to represent Defendant UBS Financial Services, Inc. in the above captioned matter be granted.

Dated: June 9, 2011 Wayne, New Jersey

Respectfully Submitted,

Ву:

John J/Scura II, Esq. SDNY Bar JS7016

Dated: June ___, 2011

Sworn to before me this 94h day of hune, 2011

Eileen C. Wildey

A Notary Public of New Jersey
My Commission Expires 12/16/2014

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

RACHEL YOUNGER, Individually and as Administrator of the Estate of NATHANIEL YOUNGER,

Case No. 11 Civ. 1173

Plaintiff,

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

- against -

ZURICH AMERICAN INSURANCE COMPANY, and UBS FINANCIAL SERVICES, INC.

Defendants.

Upon the motion of John J. Scura II, Esq., attorney for Defendant UBS Financial Services, Inc. and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Christopher Heyer, Esq.
Scura, Mealey, Wigfield & Heyer, LLP
1599 Hamburg Turnpike
Wayne, New Jersey 07470
Tel. (973) 696-8391
Fax (973) 696-8571
E-mail cheyer@scuramealey.com

is admitted to practice pro hac vice as counsel for Defendant UBS Financial Services, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an EFC password at nysd uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: June 9, 2011 New York, New York

United States District/Magistrate Judge

| UNITED | STATES | DISTRIC | COU | JRT |
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RACHEL YOUNGER, Individually and as Administrator of the Estate of NATHANIEL YOUNGER,

Case No. 11 Civ. 1173

Plaintiff,

CERTIFICATION OF SERVICE

- against -

ZURICH AMERICAN INSURANCE COMPANY and UBS FINANCIAL SERVICES, INC.

Defendants.

- I, Christopher Heyer, Esq., of full age, certify that:
- 1. I am a member of the law firm of Scura, Mealey, Wigfield & Heyer, LLP, counsel for Defendant UBS Financial Services, Inc. in the above captioned action.
- 2. On June 9, 2011, I served via Regular Mail First Class an original and two (2) copies of Defendant UBS Financial Services, Inc.'s Motion to Admit Counsel Pro Hac Vice, Order for Admission Pro Hac Vice on Written Submission and the Affidavit of John J. Scura II, Esq. in Support of Motion to Admit Counsel Pro Hac Vice to Admissions Clerk of the United States District Court for the Southern District of New York, 500 Pearl Street New York, New York 10007-1312. On same date I sent via electronically a copy of said papers to the following:

Cye E. Ross, Esq. 30 Vesey Street, Suite 1800 New York, New York 10007 Attorney for Plaintiff

Andrew I. Hamelsky, Esq.
White and Williams LLP
One Penn Plaza
41st Floor, Suite 4110
New York, New York 10119
Attorney for Defendant Zurich American Insurance Company

Steven S. Fitzgerald, Esq.
Wollmuth Maher & Deutsch, LLP
500 Fifth Avenue
New York, New York 10110
Attorney for Defendant Zurich Life Insurance Company

Honorable Thomas P. Griesa, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street, Courtroom 26B New York, New York 10007-1312.

I hereby certify that the foregoing statements made by me are true. I am aware that if any such statements are willfully false, I am subject to punishment.

Bv.\

Zhristophe/Hey